

UNITED STATES DISTRICT COURT  
for the  
Eastern District of Pennsylvania

United States of America )  
v. )  
RAHMAN HALIMI ) Case No.  
 ) 23-mj-954  
 )  
 )

*Defendant(s)*

## **CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 6, 2023 and May 8, 2023 in the county of Philadelphia in the  
Eastern District of Pennsylvania, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 2113(a)	Bank Robbery-- Two Counts

This criminal complaint is based on these facts:

See attached affidavit.

Continued on the attached sheet.

s/ James F. Finnegan

*Complainant's signature*

James F. Finnegan, Special Agent

*Printed name and title*

Sworn to before me and signed in my presence.

Date: 05/09/2023

s/ Honorable David R. Strawbridge

*Judge's signature*

City and state: Philadelphia, Pennsylvania

David R. Strawbridge, Magistrate Judge

*Printed name and title*

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, James F. Finnegan, being first duly sworn under oath and deposed, state the following:

**INTRODUCTION**

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) assigned to the Philadelphia, Pennsylvania Division. I have been employed with the FBI since February of 2006. I am therefore a “federal law enforcement officer” as defined by Fed. R. Crim. P. 41(a)(2)(C). I am currently assigned to the Violent Crimes Task Force (VCTF) and have been since August 2017. My current duties include, among other things, the investigation of bank robberies, fugitives, kidnappings, assault on federal law enforcement officers and Hobbs Act robberies. Prior to my duties as a Special Agent with the FBI, I was a Commissioned United States Marine Corps Officer (Captain) and Naval Aviator from May 1997 to February 2006.

2. This affidavit is being submitted in support of a criminal complaint and arrest warrant charging **RAHMAN HALIMI, (DOB: 09/11/1989)**, with two counts of bank robbery, in violation of Title 18, United States Code, Section 2113(a).

3. On Saturday, May 6, 2023, at approximately 10:50AM, an unknown white male, later identified as HALIMI, walked into ShopRite Supermarket located at 11000 Roosevelt Boulevard, Philadelphia, Pa. 19116 and walked to the Citizens Bank that is located inside the ShopRite. HALIMI walked up to the victim/teller and handed him a demand note that stated, “BANK ROBBERY NO GPS NO DYE PACK ALL LOOSE HIGH BILLS.” The victim/teller complied and gave HALIMI approximately \$975.00 dollars in United States Currency (USC). HALIMI, who did not say a word during the robbery, took the USC and walked out of the ShopRite Supermarket. HALIMI was described as an unknown white male possibly Middle

Eastern, approximately 5'9" in height, thin build, wearing an Army fatigue baseball hat, blue Covid mask, Army fatigue jacket, and blue latex gloves.

4. On Monday, May 8, 2023, at approximately 11:45AM, an unknown white male, later identified as HALIMI, walked into ACME Supermarket located at 2201 Cottman Avenue and briefly walked around the supermarket until walking to towards the Citizens Bank that is located inside of ACME Supermarket. HALIMI walked directly up to the victim/teller and handed her a demand note that stated, "BANK ROBBERY NO GPS NO DYE PACKS LARGE BILLS I WILL GO TAKE THE MONEY." The victim/teller complied and gave HALIMI approximately \$500.00 dollars in United States Currency (USC) from the Teller Cash Recyclers (TCR) machine. HALIMI, who did not say a word during the robbery, took the USC and walked out of ACME in an unknown direction. HALIMI was described as an unknown white male possibly Middle Eastern or Hispanic, approximately 5'9" in height, thin build, black heard, wearing an Army fatigue baseball hat, white Covid mask, Army fatigue jacket, Army fatigue pants, and white latex gloves.

5. On Tuesday, May 9, 2023, at approximately 1:32 p.m., HALIMI, wearing Army fatigue hat, jacket and pants, walked into the ShopRite Supermarket located at 11000 Roosevelt Boulevard, Philadelphia, Pa. 19116. HALIMI walked around the supermarket and was observed by the manager of Citizens Bank inside the supermarket. The manager recognized HALIMI as the same male that robbed the bank on Saturday, May 6, 2023, for which the manager was a witness to. The manager called 911, and Philadelphia Police Officers were dispatched to the location. HALIMI was apprehended by police as he walked out of the supermarket and toward his vehicle. The manager positively identified the male as the same male that robbed the Citizens

Bank on May 6, 2023. HALIMI was identified as **RAHMAN HALIMI, (DOB: 09/11/1989)** via his driver's license that was in his possession at the time of arrest.

6. HALIMI was transported to the FBI Headquarters in Philadelphia for processing and interview. After being advised of the rights via an FBI Form FD-395, HALIMI signed a waiver of his rights and provided a full confession to robbing both Citizens Banks as described above on May 6, 2023, and May 8, 2023. HALIMI signed the bank surveillance photos and a copy of the demand notes to both bank robberies. This interview was audio and video recorded.

7. HALIMI is currently on federal supervised release. HALIMI plead guilty in the United States District Court for the Eastern District of Pennsylvania to four counts of bank robbery on June 12, 2019. On March 2, 2023, HALIMI was sentenced to 54 months' imprisonment and three yeas' supervised release.

8. The deposits of Citizens Bank are insured by the Federal Deposit Insurance Corporation (FDIC) and were insured by the FDIC at the time of the aforementioned bank robberies described above.

9. Based on the information set forth above, I believe there is probable cause to charge RAHMAN HALIMI with the May 6, 2023 and May 8, 2023 robbery of Citizens Bank in violation of Title 18, United States Code, Sections 2113(a).

Respectfully Submitted,

*s/ James F. Finnegan*  
\_\_\_\_\_  
JAMES F FINNEGAN  
Special Agent  
Federal Bureau of Investigation

Sworn to and subscribed  
before me this 9  
day of May 2023.

*s/ Honorable David R. Strawbridge*  
\_\_\_\_\_  
Honorable David R. Strawbridge  
United States Magistrate Judge

**ATTACHMENT A**

**COUNT ONE—BANK ROBBERY—18 U.S.C. § 2113(a)**

On or about May 6, 2023, defendant Rahman Halimi, knowingly and unlawfully, by force and violence, and by intimidation, took from employees of Citizens Bank, located at 11000 Roosevelt Boulevard, Philadelphia, PA , lawful currency of the United States, that is, \$975.00 belonging to, and in the care, custody, control, management and possession of Citizens Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation, in violation of 18 U.S.C. §2113(a).

**COUNT TWO—BANK ROBBERY—18 U.S.C. § 2113(a)**

On or about May 8, 2023, defendant Rahman Halimi, knowingly and unlawfully, by force and violence, and by intimidation, took from employees of Citizens Bank, located at 2201 Cottman Avenue, Philadelphia, PA , lawful currency of the United States, that is, \$500.00 belonging to, and in the care, custody, control, management and possession of Citizens Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation, in violation of 18 U.S.C. §2113(a).